NORTH CAROLINA DIVISION OF AIR QUALITY

Application Review

Issue Date: xx/xx/2020

Region: Fayetteville Regional Office
County: Cumberland
NC Facility ID: 2600161
Inspector's Name: Jeffrey D. Cole
Date of Last Inspection: 10/24/2019
Compliance Code: 3 / Compliance - inspection

Facility Data

Applicant (Facility's Name): Cumberland Co - Ann Street Landfill

Facility Address:
Cumberland Co - Ann Street Landfill
698 Ann Street
Fayetteville, NC 28301

SIC: 4953 / Refuse Systems
NAICS: 562212 / Solid Waste Landfill

Facility Classification: Before: Title V **After:** Title V
Fee Classification: Before: Title V **After:** Title V

Permit Applicability (this application only)

SIP: 15A NCAC 02D .0524, 02D .1110, 02D .1111
NSPS: Subpart XXX
NESHAP: 40 CFR 61, Subpart M; 40 CFR 63, Subpart AAAA
PSD: N/A
PSD Avoidance: N/A
NC Toxics: N/A
112(r): N/A
Other: N/A

Contact Data

Facility Contact	Authorized Contact	Technical Contact
Chad McLean Landfill Operations Manager (910) 366-2181 698 Ann St. Fayetteville, NC 28301	Amanda Bader PE, LEED AP/Director (910) 321-6920 698 Ann Street Fayetteville, NC 28301	Neal Cunnington Landfill Gas Technician (910) 322-0535 698 Ann St. Fayetteville, NC 28301

Application Data

Application Number: 2600161.17A
Date Received: 11/29/2017
Application Type: Modification
Application Schedule: TV-Significant

Existing Permit Data
Existing Permit Number: 08846/T09
Existing Permit Issue Date: 11/15/2019
Existing Permit Expiration Date: 12/31/2021

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2018	0.3300	3.20	5.11	17.43	0.7900	2.07	0.6368 [Toluene]
2017	0.3900	2.53	12.89	13.74	0.6200	1.98	0.6301 [Toluene]
2016	0.3500	1.95	17.85	12.81	0.3700	2.99	1.06 [Toluene]
2015	0.4500	1.50	13.86	17.29	0.4000	2.20	0.7655 [Toluene]
2014	0.6500	2.31	12.52	23.23	0.5500	1.96	0.6707 [Toluene]

Review Engineer: Joshua L. Harris

Review Engineer's Signature: **Date:**

Comments / Recommendations:
Issue 08846/T10
Permit Issue Date: xx/xx/2020
Permit Expiration Date: 12/31/2019

1. Purpose of Application

The Cumberland County - Ann Street Landfill (Ann Street Landfill) is an active municipal solid waste (MSW) landfill located in Fayetteville, Cumberland County, North Carolina. Application No. 2600161.17A was received on November 29, 2017 for a Significant Modification to the landfill's air quality permit to include the requirements of NSPS Subpart XXX. The application also lists 40 CFR 61, Subpart M as an applicable Federal rule, so those conditions will also be incorporated in the permit. The applicant also submitted a request to remove the rock crusher and screen (ID Nos. ES-4 and ES-5) from the permit since these sources are no longer functional and are being removed.

The application will go through the 30-day public notice and 45-day EPA review periods prior to issuance.

The facility contact for this application is Amanda Bader, Solid Waste Director, (phone: 910-321-6920). A consultant, SCS Engineers P.C. (SCS), was used for the preparation of this application. The contact at SCS is David Greene, Project Manager, (phone: 828-285-8951).

2. Facility Description

The Ann Street Landfill is owned and operated by Cumberland County, and consists of a closed landfill (ID No. ES-1) and an active landfill (ID No. ES-2). ES-1 is further subdivided into two sections known as the "Flatland" and the "Bale Field." In 2017 the landfill demonstrated that the Flatland area contributes less than 1% of the total NMOC emissions from the landfill and is considered as a nonproductive area that can be excluded from control.

The landfill operates under Solid Waste Permit No. 2601, and only accepts waste from Cumberland County. The landfill has a design capacity in excess of 2.5 million m^3 and 2.5 million Mg, has demonstrated an NMOC emission rate in excess of 50 Mg/yr, and has been modified after July 17, 2014. Landfill gas (LFG) is collected by an installed gas collection and control system (ID No. CD-GCCS1) and is either routed to a gas treatment system (ID No. CD-GasTreatment), or to a candlestick-type flare (ID No. CD-2). Treated gas is sent to a local facility, Cargill, Inc. - Fayetteville (Facility ID 2600016), where it is combusted in the facility's natural gas/LFG-fired boilers.

3. Application Chronology

11/29/17	The Division of Air Quality (DAQ), Raleigh Central Office (RCO), received the permit application for a Significant Modification, Application No. 2600161.17A, and forwarded a copy to the Fayetteville Regional Office (FRO). The application contained the required forms, and there was no request for confidentiality. The application included the required $929 modification fee.
12/04/17	RCO sent the facility a letter acknowledging receipt of permit application.
07/12/19	Application No. 2600161.17A reassigned to Joshua Harris.
09/09/19	RCO received additional request to remove the rock crusher and screen (ID Nos. ES-4 and ES-5) from the facility's permit since they are no longer functional.

11/15/19 Joshua Harris spoke with David Greene regarding insignificant sources at the landfill. Mr. Greene stated that the portable shredder (ID No. IES-Shredder) is going to be removed and that there is a 3,000-gallon diesel fuel storage tank that should be added to the permit attachment as an insignificant source. Mr. Harris sent an email to Amanda Bader requesting verification of these changes.

11/15/19 Air Quality Permit Revision No. 08846T09 issued for a State-Only modification to upgrade the landfill gas-fired flare.

11/20/19 Joshua Harris received an email from Amanda Bader verifying that the portable shredder was removed, and that the volume of the diesel fuel storage tank is 8,000 gallons.

11/21/19 Joshua Harris sent electronic copies of the draft permit and review documents for Application No. 2600161.17A to Booker Pullen, Samir Parekh, and Heather Carter for comments.

11/22/19 Booker Pullen responded with minor editorial comments.

11/26/19 Samir Parekh responded with no comments.

12/03/19 Jeff Cole responded stating that the FRO did not have any comments.

12/03/19 Joshua Harris sent electronic copies of the draft permit and review documents to Amanda Bader, Chad McLean, Neal Cunnington, and David Greene for comments.

01/15/20 Joshua Harris sent David Greene a follow-up email regarding the request for comments from the facility. Mr. Harris received a phone call from David Walker of SCS Engineers, who relayed a message from Mr. Greene that the facility did not have any comments on the draft documents.

Xx/xx/20 30-day public notice and 45-day EPA review periods begin.

Xx/xx/20 Public notice period ends; [comments received].

Xx/xx/20 EPA review period ends; [comments received].

Xx/xx/20 Air Quality Permit Revision No. 08846T10 issued.

4. Table of Changes to Existing Permit No. 08846T09

Page No.	Section	Description of Changes
Cover and Throughout	Cover and Throughout	• Updated permit revision numbers and dates throughout. • Updated PSD increment tracking statement.
Attachment to Cover	Attachment to Cover	• Removed portable shredder (ID No. IES-Shredder) since it is no longer on site. • Added 3,000-gallon diesel fuel storage tank as ID No. IES-1
3	1 (Table)	• Updated regulatory citations for the landfills (ID Nos. ES-1 and ES-3) to indicate applicability of NSPS Subpart XXX and 40 CFR 61, Subpart M. • Removed rock crusher and screen (ID Nos. ES-4 and ES-5) as permitted sources at facility's request.
4	2.1 A. (Table)	• Updated regulatory citations for NMOC control requirements. • Inserted row for asbestos and 40 CFR 61, Subpart M. • Updated standards for HAPs to include requirement to comply with NSPS Subpart WWW requirements.
4	2.1 A.1.c.	Specified that no reporting is required when firing landfill gas in the flare.
5-15	2.1 A.3.	Removed NSPS Subpart WWW conditions and inserted NSPS Subpart XXX conditions.
15-16	2.1 A.4.	Inserted 15A NCAC 02D .1110 conditions for 40 CFR 61, Subpart M for asbestos.
17-24	2.1.A.5.	Updated permit conditions for MACT Subpart AAAA to include specific conditions for compliance with NSPS Subpart WWW.
24	2.1 B.	Removed permit section associated with the rock crusher and screen and replaced with a "Reserved" section.
24	2.2	Removed rock crusher and screen as subject sources.

5. Changes in Equipment

- Removed the rock crusher and screen (ID Nos. ES-4 and ES-5) as permitted sources since they are no longer operable and are being removed from the site.
- Removed IES-Shredder since it is no longer on site.
- Added one 8,000-gallon diesel fuel storage tank as ID No. IES-1

Title V Equipment Editor (TVEE) is up to date for the changes listed above.

The facility's permitted emission sources are as follows:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-1 NSPS XXX, MACT AAAA, 40 CFR 61 Subpart M	Municipal Solid Waste Landfill (closed portion)	CD-GCCS1	One landfill gas collection and control system
		CD-2	One landfill gas-fired candlestick-type flare (2,500 scfm gas flow rate)
ES-3 NSPS XXX, MACT AAAA, 40 CFR 61 Subpart M	Municipal Solid Waste Landfill (active portion)	CD-GasTreatment	One landfill gas treatment system that compresses the landfill gas, filters it, and dewaters (refrigeration) it prior to offsite sale

The facility's insignificant/exempt activities are as follows:

Emission Source ID No.	Emission Source Description
IES-1	Diesel fuel storage tank (8,000-gallon capacity)
IES-A1	Leachate pond (914,000-gallon capacity, 30,000 square feet of surface area)
IES-A2	Above ground used oil storage tank (1,000-gallon capacity)

6. NSPS, NESHAP, PSD, 112(r), CAM & Attainment Status

- **NSPS** –

  ✓ The MSW landfills (ID Nos. ES-1 and ES-3) are subject to 40 CFR 60, Subpart XXX "Municipal Solid Waste Landfills that Commenced Construction, Reconstruction, or Modification after July 17, 2014" since the landfill has increased the permitted design capacity and construction was commenced after July 17, 2014.

  ✓ The MSW landfills (ID Nos. ES-1 and ES-3) are NOT subject to 40 CFR 60, Subpart WWW "Municipal Solid Waste Landfills" since NSPS Subpart WWW is superseded by Subpart XXX.

- **NESHAP** –

  ✓ The MSW landfills (ID Nos. ES-1 and ES-3) are subject to 40 CFR 63, Subpart AAAA "Municipal Solid Waste Landfills" since the design capacity is greater than 2.5 million Mg and 2.5 million m^3, and the NMOC emission rate exceeds 50 Mg/yr.

  ✓ The MSW landfills (ID Nos. ES-1 and ES-3) are subject to 40 CFR 61, Subpart M "Asbestos" since the landfill is an active disposal site for asbestos-containing waste.

- **PSD –** PSD is not impacted by this permitting action.

  ✓ Cumberland County has triggered increment tracking under PSD for PM_{10} and SO_2. This permit modification expands the following increments:

Pollutant	Change due to removal of ES-4 and ES-5* (lb/hr)
PM_{10}	-1.18

* Emission rates are from the T07 permit revision which was issued to include these as permitted sources.

- **112(r) –** The facility does not store any of the listed 112(r) chemicals in amounts that exceed the threshold quantities. Therefore, the facility is not required to maintain a written Risk Management Plan (RMP).

- **CAM –** CAM does not apply since the facility is regulated by NSPS and MACT regulations that were promulgated after 1990 and control the pollutants that would be subject to CAM.

- **Attainment status** – Cumberland County is in attainment for all criteria pollutants.

7. Regulatory Review

The facility is subject to the following air quality regulations in addition to the General Conditions:

- 15A NCAC 02D .0516: Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 02D .0521: Control of Visible Emissions
- 15A NCAC 02D .0524: New Source Performance Standards, 40 CFR 60, Subpart XXX
- 15A NCAC 02D .1110: National Emission Standards for Hazardous Air Pollutants, 40 CFR 61, Subpart M
- 15A NCAC 02D .1111: Maximum Achievable Control Technology, 40 CFR 63, Subpart AAAA
- 15A NCAC 02D .1806: Control and Prohibition of Odorous Emissions

The following permit conditions are being removed as part of this permit application:

- 15A NCAC 02D .0510: Particulates from Sand, Gravel, or Crushed Stone Operations
- 15A NCAC 02D .0524: New Source Performance Standards, 40 CFR 60, Subpart WWW
- 15A NCAC 02D .0524: New Source Performance Standards, 40 CFR 60, Subpart IIII
- 15A NCAC 02D .1111: Maximum Achievable Control Technology, 40 CFR 63, Subpart ZZZZ

Except for the following, there are no changes to the permit conditions since the last outside of general updates made to include the most recent permitting language.

15A NCAC 02D .0524: New Source Performance Standards, 40 CFR 60, Subpart XXX:
Construction commenced on the most recent expansion after July 17, 2014, triggering applicability of NSPS Subpart XXX. The facility is subject to the requirement to install and operate a GCCS, and has an existing system installed since the landfill was previously also required to operate a GCCS when it was subject to NSPS Subpart WWW. As such, a new condition will be included in the permit to include the monitoring, recordkeeping, and reporting requirements of NSPS Subpart XXX as they apply to a landfill which operates an active GCCS, to include requirements for landfills utilizing a gas treatment system.

Since there is no "transitional language" in the regulation, DAQ's current interpretation of NSPS XXX compliance timeframes for landfills that were previously subject to the NSPS WWW requirement to operate a GCCS is that the landfill may have the full 30-month compliance timeframe to comply with the requirements of NSPS XXX. During the 30-month timeframe, the facility will be required to continue to comply with NSPS WWW; those requirements are enumerated within the MACT AAAA permit conditions, so continued compliance is expected. There are other portions of the NSPS XXX regulations that may still apply during this timeframe, and specific actions may need to be taken by the Permittee to comply with those requirements. The NMOC emission rate report was submitted on October 10, 2017, therefore the landfill will be required to comply with the NSPS XXX conditions no later than April 10, 2020. The landfill rules are currently under reconsideration by EPA, and this permit condition may need to be revisited in the future should changes be made to the rule.

The landfill has submitted an updated design plan, which was approved by DAQ on June 6, 2019. The design plan included the following approved alternative procedures which will be included in the permit:

- ✓ Operate the collection and control system with a pressure at each well head of up to 5 inches of water column in areas that have a geomembrane or synthetic cover.

- ✓ When applicable, the Permittee may use an EPA approved on-site multi-gas analyzer, in lieu of a laboratory method, for determining the oxygen content of the landfill gas at each well and monitoring point.

- ✓ If the gas collection and control system does not contain any bypasses of the flare, the requirement to record flow of bypass of the flare is not applicable.

- ✓ The Permittee may use USEPA Method 3C or ASTM D3588 in place of Method 18 and ASTM D1946 to determine landfill gas components for calculating net heating value under 60.18(c)(3).

Additionally, the landfill was recently issued a permit for a modification, revision T09, to upgrade the flare to a larger unit. To date, the new flare does not appear to have been installed. Therefore, the condition for the landfill to conduct an initial performance test on CD-2 to demonstrate compliance with the requirements of 40 CFR 60.18 will be brought forward.

Compliance is expected.

15A NCAC 02D .1110: National Emission Standards for Hazardous Air Pollutants, 40 CFR 61, Subpart M:

The facility is an active disposal site for asbestos-containing wastes; therefore, it is subject to the requirements of this regulation. To comply, the facility must adhere to a general set of work practices which may include ensuring there are no visible emissions at the disposal site, covering waste daily with at least six inches of compacted non-asbestos material or use another dust suppression agent, or the landfill may propose alternative methods for DAQ approval. The facility will be required to post signage and barriers if the method of compliance does not include covering the asbestos-containing waste. Closed portions of the landfill which have previously received asbestos-containing waste are also subject and are required to comply with the requirements of 40 CFR 61.151 for inactive waste disposal sites. The facility's current Solid Waste permit contains a requirement for the facility to comply with the requirements of 40 CFR 61, Subpart M, and continued compliance is expected.

15A NCAC 02D .1111: Maximum Achievable Control Technology, 40 CFR 63, Subpart AAAA:

The MSW landfill (ID No. ES-01) is the subject source. Compliance with MACT Subpart AAAA is achieved by complying with the requirements of NSPS Subpart WWW. The condition has been updated to include the specific requirements of NSPS Subpart WWW since a reference condition for this regulation has been removed. This condition may need to be revisited in the future as EPA works to deconflict the relationships among the MACT, NSPS WWW, and NSPS XXX regulations. Continued compliance is expected.

8. Other Regulatory Requirements

- A Zoning Consistency Determination is NOT required for this permit application.
- A P.E. Seal is NOT required for this permit application.
- The required permit application fee of $929 was received by RCO.

9. Air Toxics

The landfill made a toxics demonstration when the 2,500 scfm flare (ID No. CD-2) was permitted. Dispersion modeling was conducted for pollutants that exceeded their respective TPERs from 02Q .0711(a), and the modeled emission rates were based on the maximum emission rate for the flare, and on volume emissions from the landfill projected through CY2023. Since the landfill is subject to NESHAP and MACT regulations, it is exempt from permitting for State toxics pursuant to 15A NCAC 02Q .0702(a)(27); the permit does not contain 02D .1100 or 02Q .0711 toxics conditions.

The following impacts resulted from that demonstration:

Toxic Air Pollutant	Averaging Period	Modeled Emission Rates		Concentration at Property Boundary ($\mu g/m^3$)	AAL ($\mu g/m^3$)	% AAL
		Landfill	Flare			
Acrylonitrile	lb/day	0.56	9.24×10^{-3}	0.60	30	2.0%
	lb/hr	0.023	3.85×10^{-4}	2.86	1000	0.3%
Benzene	lb/yr	90.75	1.50	0.043	0.12	35.8%
Hydrogen chloride	lb/hr	-----	0.587	0.89	700	0.2%
Hydrogen sulfide	lb/day	11.36	0.19	12.32	120	10.3%
Vinyl chloride	lb/yr	279.04	30.71	0.14	0.38	36.2%

Emissions of toxic air pollutants should be periodically re-evaluated as the landfill grows, at least through each renewal period.

10. Emissions Review

Pollutant	Potential After Controls / Limitations tons/yr	Potential Before Controls / Limitations tons/yr
PM (TSP)	5.57	-----
PM_{10}	5.57	-----
$PM_{2.5}$	5.57	-----
SO_2	21.00	-----
NOx	22.61	-----
CO	103.06	-----
VOC	6.35	22.72

The facility's actual emissions as reported on the annual AQEI can be seen in the table on page one of this document.

MSW Landfill Emissions:
The potential volume emissions, before and after controls, from the landfill surface (ID No. ES-1) were calculated using the methodology in AP-42 Chapter 2.4 (November 1998) and are based on a LFG generation rate of 24,772,477 m^3/year, through CY2023, as determined using LandGEM, and default values for pollutant concentrations, VOC content, collection efficiency, and control efficiency.

Flare Emissions:
VOC emissions for the flare were calculated as above but are based on the maximum capacity of the flare, regardless of LFG generation rate from the landfill, and assume a 98% control efficiency.

Particulate, NOx, and CO emissions were calculated using the following emission factors:
NOx: 0.068 lb/mmBtu (AP-42 13.5-1)
CO: 0.31 lb/mmBtu (AP-42 13.5-2)
PM: 17 lb/10^6 ft^3 CH_4 (AP-42 2.4-5)

The flare is rated for 75.9 mmBtu/hr at 1,250 ft^3 CH_4 per minute (657 million ft^3 CH_4 per year), with a heat value of 506 Btu per cubic foot of landfill gas.

Examples:

$$\frac{75.9\ \text{mmBtu}}{\text{hour}} \times \frac{0.068\ \text{lb NOx}}{\text{mmBtu}} \times \frac{8{,}760\ \text{hours}}{\text{year}} \times \frac{1\ \text{ton}}{2000\ \text{lb}} = 22.61\ \frac{\text{tons NOx}}{\text{year}}$$

$$\frac{75.9\ \text{mmBtu}}{\text{hour}} \times \frac{0.31\ \text{lb CO}}{\text{mmBtu}} \times \frac{8{,}760\ \text{hours}}{\text{year}} \times \frac{1\ \text{ton}}{2000\ \text{lb}} = 103.06\ \frac{\text{tons CO}}{\text{year}}$$

$$\frac{657\ \text{million ft}^3\ \text{CH}_4}{\text{year}} \times \frac{17\ \text{lb PM}}{\text{million ft}^3\ \text{CH}_4} \times \frac{1\ \text{ton}}{2000\ \text{lb}} = 5.58\ \frac{\text{tons PM}}{\text{year}}$$

All particulate emissions from the combustion of landfill gas are considered as $PM_{2.5}$.

To calculate potential SO_2 emissions, AP-42 Chapter 2.4 was used along with information submitted by the facility in the application:

- Flare design rating = 2,500 ft^3/minute (or 70.79 m^3/min = 4,247 m^3/hour)
- Methane is only 50% of this gas stream (2,123.5 m^3/hour)
- Q_S = Emission rate of reduced sulfur compounds, m^3/hour
- C_S = Concentration of reduced sulfur compounds (200 ppmv, as H_2S assumed by facility)
- Multiplication factor for 50% methane concentration in landfill gas = 2.0
- Molecular weight of sulfur = 32.06 g/mole

$$Q_s = 2.0 \times Q_{CH_4} \times \left(\frac{C_s}{1\times10^6}\right) \text{ (AP-42, Equation 3)}$$

$$Q_s = 2.0 \times 2{,}123.5\ \frac{m^3}{\text{hour}} \times \left(\frac{200\ \text{parts}}{1\times10^6}\right) = 0.85\ \frac{m^3}{\text{hour}}$$

The mass of the pre-combustion sulfur compounds present in the methane were found using Equation 4 of AP-42, Section 2.4.4.2.:

$$UM_s = 0.85 \frac{m^3}{hour} \times \left[\frac{32.06 \text{ g/gmol} \times 1 \text{ atm}}{8.205 \times 10^{-5} \frac{m^3 - atm}{gmol - K} \times 1000 \frac{g}{kg} \times (273 + 25°C) \text{ K}} \right] \times 2.2 \frac{pounds}{kg}$$

$$UM_s = 2.45 \frac{pounds}{hour}$$

To calculate SO_2 emitted from the combustion of sulfur, Equation 10 of Section 2.4-8 was used.

$$SO_2 \text{ emitted} = UM_s \times \frac{\eta_{col}}{100} \times 2.0$$

Where:
UM_{cl} = Uncontrolled mass emission rate of sulfur compounds (2.45 lb sulfur/hour)
η_{col} = Collection efficiency of the landfill gas collection system, percent (assumed 100% by facility)
2.0 = Ratio of the molecular weight of SO_2 to the molecular weight of Sulfur

$$SO_2 \text{ emitted} = 2.45 \frac{lb}{hour} \times \frac{100}{100} \times 2.0 \times 8760 \frac{hours}{year} \times \frac{1 \text{ ton}}{2000 \text{ lb}} = 21.5 \frac{\text{tons } SO_2}{year}$$

AP-42 does not account for the destruction efficiency of the flare, however, when the nominally assumed 98% control efficiency is accounted for, the hourly emission rate of SO_2 is 4.79 lb/hr or 21 tons per year.

11. Source Testing Information

The landfill is required to conduct an initial performance test on the LFG-fired candlestick flare (ID No. CD-2) in order to demonstrate that the flare meets the requirements of 40 CFR 60.18.

12. Statement of Compliance

The latest compliance inspection was conducted by Jeff Cole and Mitch Revels, both of FRO DAQ, on October 24, 2019. The facility was found to be operating in apparent compliance at the time.

The facility's five-year compliance history is as follows:

02/21/19 Notice of Violation issued for failure to operate GCCS. All violations have been resolved.

09/08/17 Notice of Deficiency issued for late submittal of test results associated with the demonstration for exclusion of the Flatland area from control requirements.

06/13/17 Civil penalty of $20,545 was assessed associated with the March 27, 2017 violations. The penalty was paid in full.

03/27/17 Notice of Violation/Notice of Recommendation for Enforcement issued for multiple issues surrounding the failure to operate and monitor the GCCS, including making inaccurate or erroneous reports.

13. Public Notice Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA.

The 30-day public notice period was from MONTH XX, 2020 through MONTH XX, 2020.

The EPA 45-day review period was from MONTH XX, 2020 through MONTH XX, 2020.

[Number of] comments were received during the public notice period and the EPA review period.

14. Comments and Recommendations

The Significant Modification application for the Cumberland Co – Ann Street Landfill located in Fayetteville, Cumberland County, NC has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The DAQ recommends the issuance of Air Permit No. 08846T10.